

ECFS - Email FilingDear FCC:

There is an urgent need for the FCC to include language assuring the continuation of existing as well as new Radio Reading Services in the switch to digital radio, and to establish a minimum signal space of 24kbps. As terrestrial radio stations lose market share in ever-expanding audio options, noncommercial stations are looking for reasons to dump Radio Reading Service (RRS) broadcast when they switch to digital.

It is vital to all those who cannot see or access standard print (estimated in the millions) that the FCC protect this valuable service and provide for a minimum digital space of 24kbps. The FCC should also provide language to allow RRSs to serve those who are visually or otherwise print-handicapped by use of any and all subscribable digital transmission methods possible (cell phone, podcast, streaming internet radio, etc).

1) Because the Commission chose not to provide a minimum bit-rate for radio reading services (RRSs) or required the carriage of a RRS in the digital mode, it has imperiled the entrance to digital realm for RRSs for the foreseeable future.

a. Without the recognition by the Commission of the amount of space required to provide the reading service (24kbps), there will either be no RRS provided or no improvement in audio quality. Both situations are unacceptable.

b. With the pressure to multicast, station operators will feel obligated to tell the reading services We don't have room for your signal and our two signals. The public interest will not be served, the RRS and the NCE will find themselves in adversarial roles, and the ability of reading services to move to digital broadcasting will be set aside pending resolution of the HDC codec issue. Once again, the RRS industry waits for yet another development while the digital conversion takes place for everyone else.

2.) While the digital giants such as Microsoft promote little or no regulation, the digital have nots are forced to sit on the sidelines; needing only one minimal, temporary rule to protect their ability to serve the American public through an emergent technology that will enhance their services as well.

a. The Commission states that it wishes to encourage the development of reading services but by its actions/non-actions supports/promotes an adversarial environment between reading services and main channel

operators.

b. Reading services historically have had to fight to be on the air at all. The Commissions own record of proceedings (82-1) is evidence that voluntary efforts do not work in the public interest. The Commission must at least make temporary rules while technological solutions can be found to reduce the bit-rate needs of all parties.

3.) The Commission fails to recognize that the manufacture of accessible technology is also in the public interest, and will help, not hinder consumer adoption of HD Radio.

a. Failure to require manufacturers to create some models of HD-Radios that will be usable by Americans who live with disabling and/or age-related debilitating conditions is short sighted (the population is aging and more consumers will need accessible units, not fewer), focusing only on the smallest segment of the population - younger persons.

b. The technology and control features needed to make accessible units are readily available; and when done at the design phase, the unit cost does not increase. More consumers will use accessible units not fewer, and all parties will benefit from a faster adoption of digital broadcasting.

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